

Exhibit 38

Excerpts of deposition of Julia Duin
(November 16, 2023)

In the Matter Of:
THE SATANIC TEMPLE
VS
NEWSWEEK DIGITAL

JULIA DUIN
November 16, 2023



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November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 -----

4 THE SATANIC TEMPLE, INC.,)

5 Plaintiff,)

6 vs.) NO. 1:22-CV-01343-MKV

7 NEWSWEEK DIGITAL, LLC,)

8 Defendant.)

9 -----

10 Videotaped Deposition Upon Oral Examination

11 of

12 JULIA DUIN

13 -----

14 Thursday, November 16, 2023

15 9:37 a.m.

16 7900 Southeast 28th Street

17 Mercer Island, Washington

18

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23

24 Cheryl Macdonald, CRR, RMR

Court Reporter

25 License No. 2498

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THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 2

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2

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34

35

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 3

1	I N D E X		
2			
3	EXAMINATION		PAGE
4	BY MR. KEZHAYA:		5
5			
6	EXHIBITS MARKED		PAGE
7	No. 1	Bates-stamped Newsweek 025...	34
8	No. 2	Bates-stamped Newsweek 015, 16 and 17.....	59
9	No. 3	Boston Globe "puff piece"...	74
10	No. 4	GetReligion podcast 2018....	75
11	No. 5	GetReligion podcast 2022....	75
12	No. 6	GetReligion podcast referring to Boston Globe...	79
13	No. 7	Editorial guidelines.....	80
14	No. 8	Newsweek article re orgies, harassment, et cetera.....	100
15	No. 9	E-mail string Bates-stamped Duin04-001 - 003.....	112
16	No. 10	E-mail string Bates-stamped Duin48-001 - 005.....	117
17	No. 11	E-mail string Bates-stamped Newsweek 032.....	136
18	No. 12	E-mail string Bates-stamped Newsweek 065 - 66.....	136
19	No. 13	E-mail string Bates-stamped Cooper 51 - 53.....	177
20			
21	Conference before Magistrate Judge Sarah L. Cave:		
22			
23	Pages 60 - 66		
24			
25			

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 4

1 THE VIDEOGRAPHER: Good morning. We are
2 now on the record. This is a Zoom -- this is an
3 in-person deposition of Julia Duin. My name is Kalia
4 Hendricks. I'm the videographer for Moburg Reporting,
5 located at 33400 9th Avenue South, Suite 207, Federal
6 Way, Washington 98003. The court reporter today is
7 Cheryl Macdonald from Moburg Reporting.

8 This deposition is being recorded this 16th
9 day of November 2023, and the time is now 9:37 a.m.
10 We are in the law offices of Lybeck, Pedreira &
11 Justus, located at 7900 Southeast 28th Street, Suite
12 500, in Mercer Island, Washington.

13 This deposition is being recorded in the
14 matter of The Satanic Temple, Incorporated, vs.
15 Newsweek Digital, LLC, No. 1:22-CV-01343-MKV, in the
16 United States District Court for the Southern District
17 of New York. This deposition was noticed by Matthew
18 Kezhaya. Counsel and all present, please identify
19 yourselves for the record, and then the witness may be
20 sworn.

21 MR. KEZHAYA: Matt Kezhaya, appearing on
22 behalf of plaintiff. I'm joined by Sonia Kezhaya.

23 MS. TESORIERO: Sara Tesoriero, appearing
24 on behalf of the witness and on behalf of the
25 defendant, Newsweek, and appearing remotely with me is

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 5

1 Cameron Stracher.

2 THE VIDEOGRAPHER: The court reporter may
3 now swear in the witness.

4 THE WITNESS: I'm Julia Duin.

5 JULIA DUIN, the witness herein, having been
6 placed under oath by the
7 Certified Court Reporter,
deposed and said as follows:

8 MS. TESORIERO: Matt, before we start, can
9 I ask that if I make an objection to form that it be
10 considered preserved for the defendant as well as the
11 witness so we don't mess up the record?

12 MR. KEZHAYA: So stipulated.

13 MS. TESORIERO: Thank you.

14

15 EXAMINATION

16 BY MR. KEZHAYA:

17 Q. Please state your full name for the record.

18 A. Julia Duin.

19 Q. Have you ever been deposed before?

20 A. No.

21 Q. What did you do in preparation for today's
22 deposition?

23 A. I consulted with counsel.

24 Q. And when did that happen?

25 A. This week.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 15

1 the state of America's clergy. Let's see. I think
2 the next one was 2015, about a Lutheran clergy woman.
3 And then there was the 2018 award that I talk about on
4 this blog.

5 **Q. I see also that you've published seven**
6 **books; is that correct?**

7 A. Mm-hmm. Yes, there would be seven. That
8 should be listed on my blog.

9 **Q. The text of the blog states you've**
10 **published seven books, the latest being "Finding Joy:**
11 **A Mongolian Woman's Journey to Christ," the biography**
12 **-- well, a biography. Before that you've published**
13 **"In the house of the Serpent Handler: A Story of**
14 **Faith and Fleeting Fame in the Age of Social Media."**

15 These are two books that you've written; is
16 that correct?

17 A. Mm-hmm.

18 **Q. You've written five other books, I deduced,**
19 **from the text. Were they all about religion?**

20 A. One was not all. One was a collection of
21 Victorian fairy-tales.

22 **Q. Okay. And I see that you have served as a**
23 **visiting journalism professor at the University of**
24 **Alaska at Fairbanks; is that correct?**

25 A. Mm-hmm.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 16

1 **Q. Have you served as professor at any other**
2 **universities?**

3 A. I was at Union University in Jackson,
4 Tennessee.

5 **Q. Any others?**

6 A. I was an adjunct professor for one semester
7 at University of Maryland. Also an adjunct -- oh, my
8 goodness. What's the name of the place? Patrick
9 Henry University in -- oh, my -- it's in Virginia,
10 Purcellville, Virginia. P-U-R-C-E-L-L-V-I-L-L-E,
11 Purcellville, Virginia.

12 **Q. Have you served as professor or teacher of**
13 **journalism anywhere else?**

14 A. No. This is my only -- those are the only
15 four places.

16 **Q. Excellent. For how long did you serve as a**
17 **professor, cumulatively?**

18 A. Let's see. Well, let's see. Well, if you
19 count up, I guess, the adjunct, two and a half years.
20 I guess if you count up the adjunct and the full-time
21 experiences, about two and a half years.

22 **Q. Okay. And in your role as professor, were**
23 **these all journalism professor roles or --**

24 A. Yes.

25 **Q. In the course of your teaching as**

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 17

1 **professor, were these basic classes or more advanced?**

2 A. First one was basic. The second one was
3 specialty -- religion reporting specialty class.
4 Third one was more basic journalism. Several feature
5 writing, basic journalism classes. Overseeing school
6 yearbook-type and school newspaper classes. And the
7 fourth one were religion reporting and political
8 reporting.

9 **Q. What is the -- what are some of the**
10 **distinctions between religion reporting and other**
11 **reporting?**

12 A. Religion reporting is reporting on a
13 specific religious group. People who believe in a --
14 who have defined beliefs, usually in some kind of --
15 usually a supreme being of some sort, religious dogma.

16 **Q. I'm asking more about the techniques. Are**
17 **there special techniques?**

18 A. How I teach it?

19 **Q. Correct.**

20 A. I would have -- I would tell students the
21 basis of each religious group. I would have a
22 practitioner of that religion come in and often tell
23 them from their point of view. I thought it was best
24 to hear from the actual person rather than just me. I
25 would also have them visit a house of worship

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 25

1 knowledgeable reporting about certain groups. So we
2 can -- we can have an educated opinion to the general
3 public.

4 Q. And more particularly, is it true that the
5 general public needs these fairly stated pieces
6 because that's a large part of how they perceive the
7 particular religion?

8 MS. TESORIERO: Objection to form.

9 A. The general public needs objective and
10 knowledgeable pieces about religion. Okay? I'll
11 state it that way.

12 Q. Why?

13 MS. TESORIERO: Objection to form.

14 A. Well, that's going to be my -- that's my
15 answer.

16 Q. I understand that's your answer. I'm
17 asking a different question, which is, why?

18 MS. TESORIERO: Objection to form.

19 A. Religion is really the -- it's really at
20 the base of our civilization, and it is important that
21 people understand it.

22 Q. When did you begin work at Newsweek?

23 A. September 2021.

24 Q. Early or late?

25 A. Sorry?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 26

1 Q. Early September or late September?

2 A. September 1st.

3 Q. When was the hiring process?

4 A. Just before that.

5 Q. How long?

6 A. A few weeks.

7 Q. The hiring process was a few weeks before
8 September 1st?

9 A. Mm-hmm.

10 Q. How did you come to apply for the job at
11 Newsweek?

12 A. I heard they were looking for someone.

13 Q. How did you hear that?

14 A. Through a mutual friend.

15 Q. Whose? Wait. Mutual with --

16 A. Someone who knew that there was an opening.

17 Q. Okay, but who was that?

18 MS. TESORIERO: Objection to form.

19 A. Just a friend. I don't have to reveal his
20 name.

21 Q. I'm not asking for the name. I'm asking
22 for the connection.

23 A. A friend who knew one of the editors.

24 Q. Okay. Which editor did he know?

25 A. He knew Dayan.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 27

1 Q. You said that Dayan was an editor?

2 A. Oh, yeah. Dayan is the same person that I
3 mentioned his name before. Dayan is the same person
4 that -- yeah, Dayan Candappa.

5 Q. That was one of your supervisors; correct?

6 A. Yes, that's right.

7 Q. Do you recognize the name Nancy Cooper?

8 A. Yes.

9 Q. Was Nancy Cooper one of your supervisors?

10 A. Yes.

11 Q. Was this mutual friend a friend of Nancy
12 Cooper's?

13 A. I have no idea.

14 Q. So this mutual friend of yours was mutual
15 between you and Dayan; correct?

16 A. Yes.

17 Q. Was this a publicly posted job opportunity?

18 MS. TESORIERO: Objection. Calls for
19 speculation.

20 A. I don't know.

21 Q. Well, did you -- how did you go about
22 applying?

23 A. I contacted Dayan.

24 Q. So this mutual friend of yours gave you
25 Dayan's information directly; is that correct?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 28

1 A. Mm-hmm, mm-hmm.

2 Q. And this was when?

3 A. Let's see. It was summer of 2021.

4 Q. Was it in August of 2021?

5 A. I'm trying to remember. Might have been.

6 I think I -- when did I contact Dayan? If I remember,

7 July. It might have been July.

8 Q. When did you hear about the job posting

9 relative to you contacting Dayan?

10 A. I think it was -- I might have heard it in

11 -- when did I hear? June maybe. Might have heard in

12 June.

13 Q. So you heard about this job opportunity and

14 then a month later reached out to Dayan?

15 A. I think so.

16 Q. And then that was approximately July that

17 you reached out to Dayan; is that correct?

18 A. I believe so.

19 Q. And then the interview process began in

20 August; is that correct?

21 A. I don't remember the exact date when it

22 began.

23 Q. I'm not asking --

24 A. It was July/August sometime.

25 Q. Was there a lengthy delay between the

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 35

1 A. [As read] "A major rift in an organization
2 called The Satanic Temple: Defamation lawsuits,
3 anti-Semitic stuff, mismanagement of funds, NDAs being
4 used to hide wrongdoing, sexual harassment, shell
5 corporations, harassment of internal critics. Sounds
6 like quite a brew. Am diving into it to see if I can
7 glean anything new of how much of the story this is.
8 More to come."

9 Q. Was this the first pitch for the subject
10 article that you wrote?

11 A. I believe so.

12 Q. When did you begin working on this article?

13 A. Well, it would have been at the beginning
14 of October.

15 Q. I see that the date would be September
16 30th, so you clearly formulated the idea of the
17 article at some point before September 30th; correct?

18 A. Let's see. Well, remember, I have to pitch
19 it first to make sure they approve it before I start
20 major work on a piece.

21 Q. I understand that that might be before you
22 start major work. My question posed is when did you
23 start working on it, including minor work.

24 A. I don't remember.

25 Q. Was it before September 1st, 2020?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 37

1 **Correct or incorrect?**

2 MS. TESORIERO: Objection to form.

3 A. This pitch was the -- this would have been,
4 really, the beginning of my work on this article.

5 **Q. This pitch was the very beginning of your**
6 **work on this article; correct?**

7 MS. TESORIERO: Objection.

8 A. I would say yes.

9 **Q. That's your testimony?**

10 MS. TESORIERO: Objection.

11 A. Just a moment. It depends on what you call
12 "work."

13 **Q. What was entailed in drafting this pitch?**

14 A. I had gotten -- I had gotten an idea for
15 this article and I drafted the pitch.

16 **Q. Where did the idea come from?**

17 A. I had -- someone suggested it to me.

18 **Q. Who suggested it to you?**

19 A. I had a -- another journalist.

20 **Q. Another journalist suggested it to you?**

21 A. Mm-hmm.

22 **Q. Who was this journalist?**

23 A. His name is Kevin.

24 **Q. What is Kevin's last name?**

25 A. Trying to remember. My mind is blank right

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 38

1 now. I can't remember.

2 Q. How did you know Kevin?

3 A. Actually, I really didn't know him.

4 Somehow he had heard of me. I really didn't -- I

5 really hardly knew the man. I mean, I really didn't

6 know him, actually.

7 Q. How did Kevin convey this idea for this
8 article?

9 A. E-mail.

10 Q. Did he write this pitch for you?

11 A. Did he write the pitch?

12 Q. Correct.

13 A. I wrote the pitch. He had some -- some of
14 this is -- some of this is pitch is taken from what he
15 wrote me.

16 Q. When did he write you that? Before or
17 after September 1st, 2021?

18 A. When did he send me that e-mail? Let's
19 see. I'm trying to remember. I know I had gotten an
20 e-mail, and I'm just trying to remember when. Trying
21 to remember when he sent it to me. And I -- I don't
22 remember. I don't remember. I really don't remember
23 when he sent it to me.

24 Q. Did you provide your counsel approximately
25 26 pages of e-mails in the course of preparing for

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 48

1 with religion.

2 Q. Your job title was "Contributing Editor."

3 A. Yes.

4 Q. Is that correct?

5 A. That was the title they gave me.

6 Q. What is a contributing editor?

7 A. I was -- how would you explain? That was
8 their choice of title, not mine.

9 Q. I'm asking for a job description.

10 A. I know. I mean, it's the same as a --
11 basically, it's the same thing as a religion reporter,
12 in my mind.

13 Q. How would you describe religion reporter in
14 terms of job description?

15 A. This is -- let's see. I would say covering
16 different religious groups. I was not usually -- not
17 -- let's see. Phrase. Sometimes Supreme Court
18 decisions on various religious groups, trends.
19 Usually not breaking news. Do you know what I mean by
20 "breaking news"?

21 Q. Not really.

22 A. Okay. There were -- breaking news is
23 something that happened right away that I would have
24 to jump on within the hour. I usually didn't do that
25 because I lived on the West Coast. It's too much

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 53

1 Q. What I'm trying to get at is did you pitch
2 this article because it sounded like it was within the
3 contours of what they were looking for?

4 A. Well, the major reason I pitched it is
5 because Halloween was coming.

6 Q. I don't understand the connection.

7 A. Halloween.

8 Q. I know what Halloween is.

9 A. Satanism, you know, Halloween. Satanism
10 has a lot to do with Halloween.

11 Q. It does?

12 A. Yeah.

13 Q. Please expand.

14 A. Halloween is a Satanic holiday.

15 Q. Let's back up a little bit. You are
16 studied in religion; correct?

17 A. Yeah.

18 Q. It's my understanding that Halloween comes
19 from a Celtic tradition; is that correct? Samhain?

20 A. Allhallows Eve. The actual name is from
21 Allhallows Eve.

22 Q. What is Allhallows Eve?

23 A. Allhallows Eve came before All Saints' Day.
24 The first holiday was All Saints' Day; Allhallows Eve
25 was the one before that. Allhallows Eve is when the

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 73

1 an actual -- more of a belief system, and a -- so with
2 -- TST was different. When you're asking my
3 understanding of Satanism, so there was before I met
4 TST, TST, and then after I met TST.

5 Q. When you say you met TST, when did you
6 first meet TST?

7 A. Well, when I -- when I began researching
8 this article I was not familiar with TST.

9 Q. In terms of month and year, when was that?

10 A. You know, so I would say October of 2021.

11 Q. So your research into this article began in
12 October of 2021?

13 A. Right.

14 Q. And it's my understanding of your testimony
15 that you were not familiar with The Satanic Temple
16 before October of 2021; is that correct?

17 A. Exactly, yes.

18 Q. Had you ever written about TST before this
19 article?

20 A. No, I had not.

21 Q. You had never written about TST before this
22 article?

23 A. Except I had in passing for some
24 GetReligion pieces.

25 Q. How many times had you written about The

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 74

1 **Satanic Temple before this article?**

2 A. I had mentioned them in a 2016 GetReligion
3 piece, in another -- I think 2018, but I'm not --
4 2016, there was another one after that. I think those
5 were the only two times I had mentioned them before
6 2021.

7 **Q. What about after the subject article?**

8 A. And then there was a 2022 GetReligion
9 piece.

10 **Q. Let's mark -- you said 2016?**

11 A. I think the first one was 2016.

12 MR. KEZHAYA: Okay. Let's mark this as
13 Exhibit 3, please. Puff piece, Satanic Temple puff
14 piece, that's going to be No. 3.

15 MS. TESORIERO: The satanic Temple comes to
16 Boston?

17 MR. KEZHAYA: I believe so, correct. These
18 appear to be three different ones.

19 MS. TESORIERO: And for the record, are
20 these highlights your own?

21 MR. KEZHAYA: Correct.

22 (Exhibit No. 3 was marked for
23 identification.)

24 **Q. Okay. Please review what we have marked as**
25 **Exhibit 3. Is that the 2016 piece that you were**

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 75

1 **referring to?**

2 A. Yes.

3 **Q. And there was a 2018 piece you mentioned as**
4 **well?**

5 A. I think it was 2018. It was the Florida
6 one?

7 MR. KEZHAYA: Let's see here. We're going
8 to mark this as Exhibit 4.

9 (Exhibit No. 4 was marked for
10 identification.)

11 MS. TESORIERO: Exhibit 5?

12 MR. KEZHAYA: Yes. That's going to be 5.

13 (Exhibit No. 5 was marked for
14 identification.)

15 **Q. Is that the approximately 2018 piece that**
16 **you had mentioned earlier?**

17 A. I think so. Is that the one in Florida?

18 **Q. I believe so.**

19 A. Yeah.

20 **Q. And we have Exhibit 5. I believe this is**
21 **your 2022 piece that you mentioned as well. And that**
22 **would be your -- Julia?**

23 A. Mm-hmm?

24 **Q. This Exhibit 5, could you please review it**
25 **and confirm that that's your 2022 piece you mentioned**

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 76

1 earlier as well.

2 A. Yes.

3 Q. Okay. So those two pieces in 2016 and 2018
4 predate the article at issue.

5 Did you tell anyone at Newsweek that you
6 had written about The Satanic Temple before?

7 MS. TESORIERO: Objection to form.

8 A. These weren't -- okay. I did not consider
9 these about The Satanic Temple.

10 Q. What would you consider them?

11 A. These are media critique pieces.

12 Q. Could you please read the title of the 2016
13 piece?

14 A. "The Satanic Temple comes to Salem and the
15 Boston Globe Does a Puff Piece."

16 Q. And it's your testimony that this is not
17 about The Satanic Temple?

18 A. It's about the Boston Globe.

19 Q. Are you still at Newsweek?

20 A. No.

21 Q. Why not?

22 MS. TESORIERO: Objection to form.

23 A. Excuse me?

24 Q. Why are you still not employed by
25 Newsweek?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 80

1 Q. Does it say tag? There should be a list of
2 tags on there.

3 A. Oh, tags?

4 Q. Yes.

5 A. Oh, okay. Tags.

6 Q. Thank you. Going back to your hiring
7 process at Newsweek, were you ever trained on
8 editorial guidelines?

9 A. No.

10 Q. Were you ever provided a copy of what we're
11 marking as Exhibit 7?

12 (Exhibit No. 7 was marked for
13 identification.)

14 A. No.

15 Q. You were never provided that?

16 A. No.

17 Q. And you were never trained on that?

18 A. No.

19 Q. Did anyone ever tell you that your pieces
20 were subject to the editorial guidelines?

21 A. No.

22 Q. Have you, prior to today, ever even heard
23 of these editorial guidelines?

24 MS. TESORIERO: Objection to form.

25 A. Yes.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 92

1 Q. How long after that pitch did you get the
2 green light to start pursuing this article?

3 A. Well, let me think. I'm trying to
4 remember. I can't remember. I don't think it was
5 long after that. However -- I don't think it was long
6 after that.

7 Q. In terms of days? Weeks?

8 A. Probably within a week.

9 Q. And to clarify, that was when you got the
10 green light to pursue the article; correct?

11 A. Sure. However -- yeah, I would say within
12 a week.

13 Q. Okay. And then how long after the green
14 light did you talk to the QueerSatanic?

15 A. Well, I had to find them first. Let's see.
16 It took some -- yeah. I had to find them. Talk them
17 into doing the interview. That took a little while.
18 So that was at least another week.

19 Q. You had to talk them into doing an
20 interview?

21 A. Well, yeah.

22 Q. What did that entail?

23 A. Numerous -- a lot of messaging back and
24 forth.

25 Q. There was a lot of messaging back and

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 93

1 **forth?**

2 A. Well, yeah.

3 **Q. How did these messages take place?**

4 A. We messaged -- let's see. Messaged each
5 other on Twitter.

6 **Q. Is that all of the messaging that took**
7 **place --**

8 A. Yes.

9 **Q. -- which constituted talking them into**
10 **doing the interview?**

11 A. Mm-hmm, mm-hmm.

12 **Q. During what time period did you have these**
13 **discussions?**

14 A. It would have been early to mid October, up
15 until the time we met.

16 **Q. Did you interface with personal Twitter**
17 **accounts or the QueerSatanic account?**

18 A. I think QueerSatanic. I believe it was
19 QueerSatanic.

20 **Q. Was it only QueerSatanic, or did you also**
21 **interface with personal accounts?**

22 A. I think it was only QueerSatanic -- I'm
23 trying to remember. I don't remember.

24 **Q. Would it refresh your --**

25 A. I'm trying -- I just cannot. What were you

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 99

1 **photos.**

2 A. All right. No. That was -- no, I did not.

3 **Q. Did Jinx Strange ever give you any names of**
4 **individuals who have allegedly been sexually abused by**
5 **anyone in the course of TST services and then covered**
6 **up?**

7 MS. TESORIERO: Objection to form.

8 A. He said he was willing to, but I didn't ask
9 him.

10 **Q. You did not ask him. Why didn't you ask**
11 **him?**

12 A. Because the article was mainly on the
13 lawsuit, and it was not on the -- it was not an
14 investigation into the sexual abuse or the finances or
15 the alt-right figures. It wasn't on these various
16 permutations. The article was on the QueerSatanic
17 people.

18 **Q. Well, I mean, the article was about the**
19 **sexual abuse and cover-up plan, was it not?**

20 MS. TESORIERO: Objection to form.

21 A. No. The article was on the lawsuit.

22 **Q. Then why did you include the statement?**

23 A. I included a lot of statements.

24 **Q. Why didn't you include the subject**
25 **statement for which we are here today?**

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 103

1 know, is TST a religion? Can you criticize it?
2 That's in the middle. I quote "you" talking about the
3 defendants. Then quote Johnson talking about the
4 background. And so, okay, so what are people saying
5 about The Satanic Temple. So, okay, what are people
6 saying.

7 So then I start asking other people, okay,
8 what are people saying. I talked to the unofficial
9 biographer, Mr. Laycock. Talked to him. Talked to
10 Mr. Strange. Talked to Ms. DeMeur. Talked to Scott
11 Malphas. These are the other two -- you know, we have
12 -- are not their true names, I know that. Talked to
13 you. Of course talked to Lucien. And by that time it
14 was -- the article is running long enough.

15 So I wanted to kind of give a general
16 picture of what was more of a -- I wanted to give more
17 of a background of what was going on with The Satanic
18 Temple. Kind of how it started. The whole
19 mocumentary. So I had to throw in a bit more details
20 about The Satanic Temple other than the lawsuit. So
21 does that answer your question?

22 **Q. How did you ascertain who you would talk to**
23 **and what degree of fact checking you were going to get**
24 **into?**

25 MS. TESORIERO: Objection to form.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 110

1 MS. TESORIERO: Can we go back off the
2 record for a second?

3 MR. KEZHAYA: Yes.

4 THE VIDEOGRAPHER: We are now going off the
5 record. The time is now 1:25 p.m.

6 (Recess.)

7 THE VIDEOGRAPHER: We are now back on the
8 record. The time is now 1:26 p.m.

9 Q. Did all of your communications with regard
10 to this article take place through your Newsweek
11 e-mail address?

12 A. The interviews with you and with Lucien
13 were on the phone. Some of the -- well, they were
14 e-mail and on the phone. I mean, the other ones were
15 e-mail interviews. I mean -- yeah. I did not -- I
16 was not on the phone. I did not talk to the
17 Jinx/Scott/Salome on the phone.

18 Q. Let's back up a little bit. You did not
19 talk to Scott Malphas on the phone; correct?

20 A. No.

21 Q. You did not talk to Jinx Strange on the
22 phone; correct?

23 A. No.

24 Q. You did not talk to Salome DeMeur on the
25 phone; correct?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 111

1 A. No.

2 Q. You did talk to Lucien Greaves on the
3 phone; correct?

4 A. Yes.

5 Q. You did talk to me on the phone; correct?

6 A. Right.

7 Q. You did talk in person with the
8 QueerSatanic group; correct?

9 A. Yes. And I talked with Mr. Laycock on the
10 phone.

11 Q. Did you talk to anyone else on the phone?

12 A. I'm trying to think who I talked with. I
13 don't recall anyone else.

14 Q. Of the e-mail interviews, were they all
15 done through your Newsweek e-mail address?

16 A. Yes, they were.

17 Q. Did you receive this complaint through your
18 Newsweek e-mail address?

19 A. When you say "this complaint" --

20 Q. The Scott Malphas complaint that you
21 (inaudible) --

22 A. Yes. It would have been through -- yes. I
23 just thought if it's not in the documents that --
24 again, in the huge amount of documents submitted for
25 this case, then I -- then my memory is erroneous. I

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 123

1 In terms of there were -- I knew there were
2 complaints about finances. Even Doug Laycock -- we're
3 talking about the sentence afterwards. Doug Laycock
4 went into that for his book. So, you know, Jinx had
5 given kind of a general -- it was a general read of
6 The Satanic Temple. And it was his -- it was how he
7 saw the state of the religion. And from my other
8 interviews with people, I found it plausible he was
9 correct.

10 **Q. Did you ask Lucien Greaves about coerced**
11 **sexual activity and cover-up within The Satanic**
12 **Temple?**

13 A. I asked him -- I certainly asked him in
14 connection with the orgies, yes.

15 **Q. Not in connection with the orgies. Did you**
16 **ask him specifically about Jinx Strange's comment?**

17 A. No. I did not ask him about Jinx Strange's
18 comment.

19 **Q. Why not?**

20 A. Why not? I didn't -- I felt I had asked
21 Lucien plenty of questions. And right below that, I
22 had a quote from Lucien that basically denied all
23 these accusations.

24 **Q. Did you confront Lucien Greaves with the**
25 **allegation that there are accounts of sexual abuse and**

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 124

1 **cover-up within The Satanic Temple?**

2 MS. TESORIERO: Objection. Asked and
3 answered.

4 A. Did I confront him? Did I confront him?
5 Trying to remember. I don't believe I did.

6 Q. So Lucien Greaves's comment in his e-mails
7 could not possibly have related to something that you
8 did not confront him with. You would agree with me
9 there; correct?

10 MS. TESORIERO: Objection to form.

11 A. I disagree.

12 Q. You disagree?

13 A. I disagree.

14 Q. Please explain your basis for disagreeing.

15 A. His quote here -- his quote underneath, it
16 covered the -- all of Jinx's accusations. He says,
17 "We are accused of all sorts of nefarious things." I
18 covered it. I covered what Jinx was saying.

19 Q. Did you ever even mention the word Jinx
20 Strange -- the name "Jinx Strange" to Lucien Greaves?

21 A. I believe I talked to -- I may have talked
22 to Jinx maybe after I talked to Lucien.

23 Q. So you didn't even talk to Jinx Strange and
24 then talk to Lucien, and yet you're telling me that
25 Lucien's comment pertains to Jinx Strange's

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 126

1 Strange or the allegations to Lucien Greaves, I find
2 it very difficult to understand how Lucien Greaves's
3 comment could have any pertinence to Jinx Strange's
4 allegations.

5 A. I don't see how --

6 THE REPORTER: Please. I need to hear the
7 end of the question.

8 MR. KEZHAYA: Jinx Strange or Jinx
9 Strange's allegation.

10 MS. TESORIERO: Are you asking her a
11 question?

12 MR. KEZHAYA: I'm asking her to explain
13 what she's -- where she's coming from with her
14 testimony.

15 MS. TESORIERO: Objection. Asked and
16 answered.

17 A. The way -- the way I constructed the
18 article is that the -- okay. Jinx gave -- Jinx had
19 several things to say about the organization, the
20 alt-right, the sexual abuse, the finances. And I had
21 Lucien giving a general denial about -- a general
22 denial. I did not feel he -- Lucien's general
23 statement had to address every single thing
24 specifically.

25 Q. Why did you have him address anything in

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 131

1 TST was engaging in criminal activity?

2 Q. As a matter of fact, you did. You wrote
3 the article, did you not?

4 MS. TESORIERO: Objection.

5 Mischaracterizes the article statement.

6 A. I did not say that.

7 Q. Oh, you did not write the article?

8 MS. TESORIERO: Objection.

9 A. I did write the article.

10 Q. You didn't include the quote in the
11 article?

12 MS. TESORIERO: Objection to form. Give me
13 a second to object and then you can answer.

14 Q. The subject quote.

15 MR. KEZHAYA: You can just say "Object to
16 form" and it's taken subject to that.

17 MS. TESORIERO: I understand, but even
18 "object to form" was getting it mixed in between. I
19 just want to let the court reporter get "objection to
20 form."

21 I believe the last question was did -- you
22 state the last question.

23 Q. Please go to page 8.

24 A. Okay.

25 Q. First line, "He wrote," quote -- read the

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 136

1 question.

2 Q. Julia, I know things are getting heated,
3 but you need to let me finish the question.

4 MS. TESORIERO: You need to let her finish
5 her answers, too.

6 MR. KEZHAYA: Fair.

7 A. Did I ask anyone? Anyone to be 7 billion
8 people? I mean --

9 Q. Well, did you ask anyone on the face of the
10 planet what sexual abuse and cover-up means in the
11 context of this here quote?

12 MS. TESORIERO: Objection to form.

13 A. Okay. I'll say no to that one. All right?

14 Q. Thank you.

15 (Exhibit Nos. 11 and 12 were marked for
16 identification.)

17 A. There's two here.

18 Q. There's two, Exhibit 11 and Exhibit 12.

19 A. Is one of them 10?

20 Q. I believe 10 was previously introduced.

21 MS. TESORIERO: I think 10 might have been
22 just sitting in front of you.

23 THE WITNESS: All right.

24 Q. Do you have Exhibit 11 in front of you?

25 A. Yes, I do.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 150

1 Q. But you don't recall when you used it
2 otherwise. That's your testimony; right?

3 MS. TESORIERO: Objection to form.

4 A. God in heaven. No. I don't recall. I
5 mean, I rarely used it. And I told you, it was like
6 -- I mean, no. I'm just going to say I don't recall.
7 I'm sick and tired of this. I mean, it is harassing
8 me.

9 Q. This is not harassment.

10 A. Yes, it is.

11 Q. You-all can take it to the judge if you
12 think this is harassment, but when you I definitely
13 did not and also "I don't recall," I'm just telling
14 you right now this is (inaudible) --

15 MS. TESORIERO: Please don't talk to my
16 witness. Ask her a question and let's move on.

17 MR. KEZHAYA: Fair.

18 Q. Earlier you testified that you had how many
19 supervisors?

20 A. Juliana was my direct supervisor at the
21 time.

22 Q. How many supervisors did you testify you
23 had before?

24 A. Well, there was a direct one, and then
25 there was one over her and then one over him. So

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 151

1 there was a direct one. Add them all up, I guess.

2 You could call -- you know, there was one direct one.

3 There were three -- I guess you could say three were

4 involved with me.

5 Q. And those three were Nancy Cooper, Dayan,
6 and Juliana; correct?

7 A. Nancy, Dayan, and Juliana, right.

8 Q. Juliana was your direct supervisor;
9 correct?

10 A. Yes.

11 Q. Did she have any involvement in the writing
12 of this article?

13 A. She was listening -- no, not really. No.
14 She was involved in the e-mails in the first week or
15 two, but then she did not do any of the editing.

16 Q. Was she involved in the pitching of this
17 article?

18 A. Well, yeah. I mean, she received my pitch.

19 Q. Did she green light this article?

20 A. Let's see. The article was discussed in a
21 meeting, and she would have been one of three people.
22 All three people would have green lighted it. I'm
23 trying to remember. I mean, it was a four-way
24 discussion. I cannot remember what Juliana personally
25 said during those discussions. She did not really say

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 152

1 much.

2 Q. You had a weekly meeting with your three
3 supervisors --

4 Correct?

5 A. Right.

6 Q. -- about --

7 A. Various things.

8 Q. -- the course of your employment
9 activities; correct?

10 A. Mm-hmm.

11 Q. Juliana was in these meetings; correct?

12 A. Right.

13 Q. And these meetings were weekly; right?

14 A. That's correct.

15 Q. They were on Mondays, if I remember
16 correctly?

17 A. Usually.

18 Q. And when did those meetings start relative
19 to September 30? Before or after?

20 A. Let's see. Because I was overseas up until
21 about -- let me think. It took a little while to get
22 them started. I mean, I don't have a calendar in
23 front of me. I don't know. Okay. It was either the
24 first or second Monday in October. It was whenever
25 that day was. I think -- and I think you have one of

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 173

1 asking me if I circled back after this hour-long --
2 hour-and-a-half-long interview and asked them about
3 something, this particular statement, who the "they"
4 was?

5 Q. I'm trying to ascertain if you performed
6 any form of fact investigation on anything that these
7 people had to say.

8 MS. TESORIERO: Objection to form.

9 A. I performed -- look, yes, I did check out
10 stuff, but you're asking about one sentence.

11 Q. When you say you checked out stuff, did you
12 find any individuals who was actually sexually
13 harassed in TST?

14 MS. TESORIERO: Objection to form.

15 A. Shall we say -- okay. I found people who
16 said they knew people who were sexually harassed. How
17 about that?

18 Q. No, not how about that. Did you actually
19 talk to any individuals who were actually sexually
20 harassed by TST?

21 MS. TESORIERO: Objection to form.

22 Q. Yes or no.

23 A. Did I talk to -- no, I did not.

24 Q. Of the people who claim that they know
25 people who were sexually harassed by TST, did you ask

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 174

1 even names or contact information who theoretically
2 could be followed up with?

3 A. No.

4 Q. You have been a journalist for 45 years;
5 correct?

6 A. Yes.

7 Q. You have been a professor of journalism for
8 approximately two and a half years; correct?

9 A. Mm-hmm.

10 Q. Do you consider yourself a serious
11 journalist?

12 MS. TESORIERO: Objection to form.

13 A. Yes, I do.

14 Q. Did you consider this piece of work to be a
15 credible, serious, and fair statement about sexual
16 abuse and cover-up?

17 A. My article was fair, yes.

18 Q. I'm asking you about the statement.

19 A. About your statement?

20 Q. Your statement. The one that you put in
21 the article.

22 A. Yes, I did. It was fair. And, yes, if I
23 hadn't believed that there wasn't sexual abuse going
24 on, I would not have put that into the article.

25 Q. And what was your basis to believe there

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 178

1 the future article ideas we discussed. And there's
2 one story I am working on re The Satanic Temple that
3 is really taking off. I am having a ton of
4 disgruntled members contact me, and what started out
5 as a TST lawsuit against four former Seattle-based
6 members has turned into a much bigger story. More
7 below."

8 Q. These are disgruntled former members who
9 were your sole sources for the claim that there was
10 actually sexual abuse and cover-up. Correct?

11 MS. TESORIERO: Objection to form.

12 A. That's what I call them here.

13 Q. That's what you called them; correct?

14 A. There.

15 Q. And they are, in fact, disgruntled former
16 members; correct?

17 MS. TESORIERO: Objection to form.

18 A. Yes.

19 Q. Do you feel you have an ethical obligation
20 to convey both sides of a serious allegation?

21 A. I did.

22 Q. Did you?

23 A. Yes.

24 Q. Where did you ask Lucien Greaves about
25 sexual abuse and cover-up?

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 183

1 going to eventually have to answer the question.

2 MS. KEZHAYA: Well, we can move on from
3 that.

4 MR. KEZHAYA: Moving on. Withdrawn.

5 Q. Julia, you've been a professor of religious
6 journalism; correct?

7 A. Journalism. A journalism professor, not
8 just religion. Not just a -- I've taught general
9 journalism and religion reporting.

10 Q. Okay. You've been serving as a journalist
11 for 45 years; correct?

12 A. Right.

13 Q. You don't know your own ethical
14 obligations?

15 MS. TESORIERO: Objection to form.

16 A. Of course I know my own ethical
17 obligations.

18 Q. Do your ethical obligations include a
19 requirement that you convey both sides of a serious
20 allegation?

21 MS. TESORIERO: Objection to form, but
22 answer.

23 THE WITNESS: Right.

24 A. I -- yes, of course.

25 Q. Would you have felt comfortable publishing

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 184

1 **a claim that TST kills children?**

2 MS. TESORIERO: Objection to form.

3 A. No.

4 **Q. Why not?**

5 A. Why not?

6 **Q. Mm-hmm.**

7 MS. TESORIERO: Objection to form.

8 A. Where do you start on this one? Because
9 it's obviously not true.

10 **Q. Okay. What causes you to say it is**
11 **obviously not true?**

12 A. Okay. I don't know -- no one has told me
13 that TST is killing children.

14 **Q. Hypothetically, if the same sources told**
15 **you that TST kills children, would you have felt**
16 **comfortable publishing that claim?**

17 MS. TESORIERO: Objection to form.

18 A. I would have asked them to prove that. I
19 would have asked them to offer some -- okay. I would
20 have asked them to prove it. Prove that TST was
21 killing children.

22 **Q. And yet you didn't ask for any proof about**
23 **this serious allegation; correct?**

24 MS. TESORIERO: Objection to form.

25 A. Okay. You're saying on the part of Jinx or

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 193

1 to believe it's not his true name. He did not say it
2 was -- his name was a pseudonym.

3 Q. Did you ask?

4 A. No.

5 Q. If you were to go about trying to find Jinx
6 Strange and he ignored your e-mail, how would you go
7 about finding him?

8 A. Fly to Wisconsin and walk into his tea
9 shop.

10 Q. I'm sorry. What?

11 A. He's got a tea shop, yeah.

12 Q. What is the name of this tea shop?

13 A. It's the -- you would ask. Okay. Go to
14 his Facebook page. Okay. It's like "The Dirge." I
15 think it's called the -- wait a minute, because I know
16 you're trying to find him. "The Dirge."

17 Q. The Dirge?

18 A. I think it's called -- look on his Facebook
19 page.

20 Q. Well --

21 A. Okay. I think -- don't take me to court on
22 this. I think it's called -- he has it on his actual
23 Facebook page. It's part of his shop.

24 Q. Did you look at his Facebook page?

25 A. Yes, I did.

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 200

1 C E R T I F I C A T E

2

3 STATE OF WASHINGTON)

4) ss.

5 COUNTY OF KING)

6

7 I, the undersigned Washington Certified Court
8 Reporter, pursuant to RCW 5.28.010, authorized to
9 administer oaths and affirmations in and for the State
10 of Washington, do hereby certify:

11 That the annexed and foregoing deposition
12 consisting of Page 1 through 199 was taken
13 stenographically before me and reduced to a typed
14 format under my direction;

15 I further certify that according to CR 30(e) the
16 witness was given the opportunity to examine, read and
17 sign after the same was transcribed, unless indicated
18 in the record that the review was waived;

19 I further certify that all objections made at the
20 time of said examination to my qualifications or the
21 manner of taking the deposition, or to the conduct of
22 any party, have been noted by me upon said deposition;

23 I further certify that I am not a relative or
24 employee of any such attorney or counsel, and that I
25 am not financially interested in said action or the

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 201

1 outcome thereof;

2 I further certify that the witness before
3 examination was by me duly sworn to testify to the
4 truth, the whole truth, and nothing but the truth;

5 I further certify that the deposition, as
6 transcribed, is a full, true and correct transcript of
7 the testimony, including questions and answers, and
8 all objections, motions, and exceptions of counsel
9 made and taken at the time of foregoing examination
10 and was prepared pursuant to Washington Administrative
11 Code 308-14-135, the transcript preparation format
12 guideline;

13 I further certify that I am sealing the
14 deposition in an envelope with the title of the above
15 cause and the name of the witness visible, and I am
16 delivering the same to the appropriate authority;

17

18 IN WITNESS WHEREOF, I have hereunto set my hand,
19 and affixed my official seal this 22nd day of
20 November 2023.

21

22

Cheryl Macdonald, CCR

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November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

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Page 202

1

D E C L A R A T I O N

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I declare under penalty of perjury that I
have read my within deposition, and the same is true
and accurate, save and except for changes and/or
corrections, if any, as indicated by me on the
correction sheet hereof.

JULIA DUIN

Dated this _____ day of _____,
2023.

CHERYL MACDONALD, Court Reporter

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 203

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REPORTER: CHERYL MACDONALD

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Page 204

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TO: Sara Tesoriero

November 22, 2023

8

51 Astor Place

9

New York, New York 10003

10

11

IN RE: The Satanic Temple v. Newsweek

12

DEPOSITION(S) OF: Julia Duin

13

DATE OF DEPOSITION: November 16, 2023

14

15

A copy of the deposition transcript of the above-named
is provided via E-transcript. Please have the
deponent read the deposition, sign the correction
sheet and declaration. The signed correction sheet
and declaration should then, within 30 (thirty) days,
be forwarded to:

16

CHERYL MACDONALD

17

33400 9th Ave. So. #207

18

Federal Way, Washington 98003

19

who will then enclose them in the original transcript,
seal it, and forward it to Mr. Kezhaya for retention
until the time of trial.

20

If you have any questions, feel free to contact
me at the number listed above.

21

22

Sincerely,

23

24

CHERYL MACDONALD, CCR

25

CC: M. Kezhaya

November 16, 2023

THE SATANIC TEMPLE vs NEWSWEEK DIGITAL

Julia Duin

Page 205

1

Certification of Court Rule and WAC Compliance

2

The Satanic Temple v. Newsweek

3

4 I, VALERIE SEATON, am an authorized representative of
 5 MOBURG REPORTING and do hereby, under penalty of perjury,
 6 certify that Moburg Reporting and all court reporters
 7 providing services in the above-captioned case on MOBURG
 8 REPORTING'S behalf will fully comply with all applicable
 9 rules and regulations governing the provision of court
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 11 Washington Superior Court Rule 28(c)-(e) and WAC
 12 308-14-130(1).*

8

11/22/23

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10 Valerie L. Seaton
 11 President
 12 Moburg Reporting

Date

11

12 *28(c) Disqualification for Interest. No deposition
 13 shall be taken before a person who is a relative or
 14 employee or attorney or counsel of any of the parties, or
 15 is a relative or employee of such attorney or counsel, or
 16 is financially interested in the action.

17 28(d) Equal Terms Required. Any arrangement concerning
 18 court reporting services or fees in a case shall be
 19 offered to all parties on equal terms. This rule applies
 20 to any arrangement or agreement between the person before
 21 whom a deposition is taken or a court reporting firm,
 22 consortium, or other organization providing a court
 23 reporter, and any party or any person arranging or paying
 24 for court reporting services in the case, including any
 25 attorney, law firm, person or entity with a financial
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 entity paying for court reporting services in the case.

20 28(e) Final Certification of the Transcript. The court
 21 reporter reporting a deposition shall not certify the
 22 deposition transcript until after he or she has reviewed
 23 the final version of the formatted transcript. A court
 24 reporting firm, consortium, or other organization
 25 transmitting a court reporter's certified transcript
 shall not alter the format, layout, or content of the
 transcript after it has been certified.

24 *308-14-130(1) Offer arrangements on a case
 25 concerning court reporting services or fees to all parties
 on equal terms.